

STATEMENT OF BASIS (AI No. 33816)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0118664 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Corporate Cleaners of Covington, Inc.
117 Rue Lamoith
Slidell, LA 70461

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Ronda Burtch

DATE PREPARED: August 7, 2009

1. PERMIT STATUS**A. Reason for Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit – NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LPDES permit – LA0118664
LPDES permit effective date: April 1, 2004
LPDES permit expiration date: March 31, 2009

D. Date Application Received: October 28, 2008

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY – dry cleaning and laundering facility**

The facility operations include dry cleaning and laundering. Sanitary wastewater and process wastewater are treated by an aerated mechanical treatment plant with chlorination. All dry cleaning wastes are contracted for proper disposal.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 7211 and 7216

C. LOCATION – 2350 Highway 190 in Covington, St. Tammany Parish
Latitude 30° 28' 02", Longitude 90° 05' 04"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: laundry wastewater and treated sanitary wastewater

Treatment: aerated mechanical treatment plant with chlorination

Location: at the point of discharge from the sewage treatment plant, prior to mixing with other waters

Flow: 800 GPD

Discharge Route: local drainage, thence into the Hwy. 190 ditch, thence into the Abita River, thence into the Bogue Falaya River

4. RECEIVING WATERS

STREAM: local drainage, thence into the Hwy. 190 ditch, thence into the Abita River, thence into the Bogue Falaya River

BASIN AND SEGMENT: Lake Pontchartrain Basin, Segment 040804

DESIGNATED USES:

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- g. outstanding natural resource waters*

* Scenic River Segment limited to confluence of East and West Prong to La. Hwy. 437, north of Covington per LAC 33:IX.1123.E[12].

5. TMDL STATUS

Subsegment 040804, Bogue Falaya River - From headwaters to Tchefuncte River (Scenic), is listed on LDEQ's Final 2006 303(d) List as impaired for pathogen indicators and mercury. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the dry cleaning and laundering point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Pathogen Indicators

The treated sanitary wastewater discharges have the potential to discharge pollutants associated with the pathogen indicators impairment. Therefore, the pathogen indicators impairment shall be addressed through the fecal coliform parameter in this permit.

Mercury

The Mercury impairment listed for subsegment 040804 applies only to those waterbodies specifically identified in LDEQ's Final 2006 Integrated Report, and not to the entire subsegment unless so specified. Because the discharge from this facility is not directly into the Bogue Falaya River, Mercury will not be addressed in permit development.

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6. CHANGES FROM PREVIOUS PERMIT

1. The monitoring frequency for all parameters has been increased from 1/month to 1/2 weeks due to the compliance history of this facility.
2. The discharge pathway has been changed to reflect that the discharge flows into the Abita River before reaching the Bogue Falaya River.

7. COMPLIANCE HISTORY/COMMENTS

- A. OEC: A review of the files for the period of July 1, through June 30, 2009 revealed that an inspection was performed at this facility on December 6, 2007. A review of available files (June – November 2007) revealed twenty nine (29) excursions. Non-compliance reports had not been submitted.
- B. DMR Review/Excursions: A DMR review for the period of July 1, 2007 through June 30, 2009, revealed the following excursions:

Date	Parameter	Reported Value	Permit Limits
July 2007	COD, Monthly Avg	348 mg/l	200 mg/l
	COD, Daily Max	348 mg/l	300 mg/l
	TSS, Monthly Avg	53 mg/l	30 mg/l
	TSS, Daily Max	53 mg/l	45 mg/l
	Fecal Coliform, Daily Max	56,000 col/100 ml	400 col/100 ml
August 2007	COD, Monthly Avg	397 mg/l	200 mg/l
	COD, Daily Max	397 mg/l	300 mg/l
	TSS, Monthly Avg	112 mg/l	30 mg/l
	TSS, Daily Max	112 mg/l	45 mg/l
	Oil & Grease, Daily Max	16.9 mg/l	15 mg/l
September 2007	COD, Monthly Avg	397 mg/l	200 mg/l
	COD, Daily Max	397 mg/l	300 mg/l
	TSS, Monthly Avg	75 mg/l	30 mg/l
	TSS, Daily Max	75 mg/l	45 mg/l
	Oil & Grease, Daily Max	27.4 mg/l	15 mg/l
October 2007	COD, Monthly Avg	347 mg/l	200 mg/l
	COD, Daily Max	347 mg/l	300 mg/l
	TSS, Monthly Avg	96 mg/l	30 mg/l
	TSS, Daily Max	96 mg/l	45 mg/l
	Oil & Grease, Daily Max	18.9 mg/l	15 mg/l
November 2007	COD, Monthly Avg	459 mg/l	200 mg/l
	COD, Daily Max	459 mg/l	300 mg/l
	TSS, Monthly Avg	96 mg/l	30 mg/l
	TSS, Daily Max	96 mg/l	45 mg/l
December 2007	COD, Monthly Avg	444 mg/l	200 mg/l
	COD, Daily Max	444 mg/l	300 mg/l
	TSS, Monthly Avg	68 mg/l	30 mg/l
	TSS, Daily Max	68 mg/l	45 mg/l
	Fecal Coliform, Daily Max	>60,000 col/100 ml	400 col/ 100 ml
	Oil & Grease, Daily Max	18 mg/l	15 mg/l
January 2008	COD, Monthly Avg	359 mg/l	200 mg/l
	COD, Daily Max	359 mg/l	300 mg/l
	TSS, Monthly Avg	76 mg/l	30 mg/l

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	TSS, Daily Max Fecal Coliform, Daily Max Oil & Grease, Daily Max	76 mg/l >60,000 col/100 ml 26.3 mg/l	45 mg/l 400 col/ 100 ml 15 mg/l
February 2008	COD, Monthly Avg COD, Daily Max TSS, Monthly Avg TSS, Daily Max Oil & Grease, Daily Max	579 mg/l 549 mg/l 84 mg/l 84 mg/l 20.6 mg/l	200 mg/l 300 mg/l 30 mg/l 45 mg/l 15 mg/l
March 2008	COD, Monthly Avg COD, Daily Max TSS, Monthly Avg TSS, Daily Max Oil & Grease, Daily Max	810 mg/l 810 mg/l 127 mg/l 127 mg/l 34.6 mg/l	200 mg/l 300 mg/l 30 mg/l 45 mg/l 15 mg/l
April 2008	NO DMR ON FILE		
May 2008	COD, Monthly Avg COD, Daily Max TSS, Monthly Avg TSS, Daily Max Oil & Grease, Daily Max	342 mg/l 342 mg/l 61 mg/l 61 mg/l 20.7 mg/l	200 mg/l 300 mg/l 30 mg/l 45 mg/l 15 mg/l
June 2008	COD, Monthly Avg COD, Daily Max TSS, Monthly Avg TSS, Daily Max Fecal Coliform, Daily Max Oil & Grease, Daily Max	442 mg/l 442 mg/l 62 mg/l 62 mg/l 22,000 col/100 ml 25.2 mg/l	200 mg/l 300 mg/l 30 mg/l 45 mg/l 400 col/ 100 ml 15 mg/l
July 2008	COD, Monthly Avg COD, Daily Max TSS, Monthly Avg TSS, Daily Max Fecal Coliform, Daily Max Oil & Grease, Daily Max	489 mg/l 489 mg/l 87 mg/l 87 mg/l 51,000 col/100 ml 23.8 mg/l	200 mg/l 300 mg/l 30 mg/l 45 mg/l 400 col/ 100 ml 15 mg/l
August 2008	NO DMR ON FILE		
September 2008	NO DMR ON FILE		
October 2008	COD, Monthly Avg COD, Daily Max TSS, Monthly Avg TSS, Daily Max Oil & Grease, Daily Max	371 mg/l 371 mg/l 122 mg/l 122 mg/l 38.9 mg/l	200 mg/l 300 mg/l 30 mg/l 45 mg/l 15 mg/l
November 2008	COD, Monthly Avg COD, Daily Max TSS, Monthly Avg TSS, Daily Max Fecal Coliform, Daily Max Oil & Grease, Daily Max	413 mg/l 413 mg/l 91 mg/l 91 mg/l 3,000 col/100 ml 29.1 mg/l	200 mg/l 300 mg/l 30 mg/l 45 mg/l 400 col/ 100 ml 15 mg/l
December 2008	COD, Monthly Avg COD, Daily Max TSS, Monthly Avg Fecal Coliform, Daily Max Oil & Grease, Daily Max	353 mg/l 353 mg/l 37 mg/l 13,000 col/100 ml 20.5 mg/l	200 mg/l 300 mg/l 30 mg/l 400 col/ 100 ml 15 mg/l
January 2009	COD, Monthly Avg COD, Daily Max TSS, Monthly Avg	400 mg/l 400 mg/l 65 mg/l	200 mg/l 300 mg/l 30 mg/l

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	TSS, Daily Max	65 mg/l	45 mg/l
	Fecal Coliform, Daily Max	27,000 col/100 ml	400 col/ 100 ml
	Oil & Grease, Daily Max	22.7 mg/l	15 mg/l
February 2009	COD, Monthly Avg	350 mg/l	200 mg/l
	COD, Daily Max	350 mg/l	300 mg/l
	TSS, Monthly Avg	39 mg/l	30 mg/l
	Fecal Coliform, Daily Max	10,000 col/100 ml	400 col/ 100 ml
	Oil & Grease, Daily Max	15.7 mg/l	15 mg/l
March 2009	COD, Monthly Avg	430 mg/l	200 mg/l
	COD, Daily Max	430 mg/l	300 mg/l
	TSS, Monthly Avg	59 mg/l	30 mg/l
	TSS, Daily Max	59 mg/l	45 mg/l
	Fecal Coliform, Daily Max	>60,000 col/100 ml	400 col/ 100 ml
	Oil & Grease, Daily Max	37.7 mg/l	15 mg/l

8. EXISTING EFFLUENT LIMITS

Pollutant	Limitation		Monitoring Frequency	Reference
	Monthly Avg	Daily Max		
	mg/L			
Flow (MGD)	Report	Report	1/month	LAC33.IX.2707.1.1.b
COD	200	300	1/month	LAG480000
TSS	30	45	1/month	LAG530000; LAC33.IX.709; BPJ
Oil & Grease	---	15	1/month	LAG530000; LAC33.IX.709; BPJ
Fecal Coliform (col/100 ml)	---	400	1/month	LAG530000; LAC33.IX.709; BPJ
pH, s.u.	6.0 (min)	9.0 (max)	1/month	LAC 33:IX.1113.C1

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040804 of the Lake Pontchartrain Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Gulf Sturgeon and Louisiana quillwort, which is listed as endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Gulf Sturgeon and Louisiana quillwort. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

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11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Corporate Cleaners of Covington, Inc.

1. **Outfall 001** - laundry wastewater and sanitary wastewater (estimated flow is 800 GPD)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow (MGD)	Report	Report	LAC33.IX.2707.I.1.b.
COD	200	300	Previous Permit; BPJ; LAG480000;
TSS	30	45	Similar discharges* (BPJ); LAG530000
Oil & Grease	---	15	Similar discharges* (BPJ); LAG530000
Fecal Coliform (col/100 ml)	---	400	Similar discharges* (BPJ); LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ); LAG530000

Treatment: Aerated mechanical treatment plant with aeration and chlorination

Monitoring Frequency: Report Flow, COD, TSS, Oil & Grease, Fecal Coliform, and pH once every two weeks (1/2 weeks)

Limits Justification:

Flow: Reporting volume of effluent discharged from the outfall is required by LAC33.IX.2707.I.1.b.

TSS, Oil & Grease, Fecal Coliform and pH: Limits are based on current guidance for similar discharges from other industrial facilities and by utilizing the Class I Sanitary Discharge General Permit, LAG530000 effective December 1, 2007

COD: COD limit included based on the previous permit to monitor discharges of soaps and detergents. The limit is based on Schedule B of the Light Commercial General Permit, LAG480000 (August 1, 2001) and BPJ.

There shall be no discharge of dry cleaning wastes.

* Existing permits for similar outfalls
BPJ Best Professional Judgement
s.u. Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC 33:IX.2511.B.14.a-k, storm water discharges from facilities classified as SIC code 7211 and 7216 are not considered to be associated with industrial activities. Therefore, an SWP3 is not included in the permit.